



MEMO ENDORSED

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JUSTIN M. HEILIG

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July 7, 2021

Via CM/ECF System

The Honorable Valerie E. Caproni
U.S. District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Letter Motion for Extension of Time and Adjournment of Conference
Barnet Marine Inc. v. Laurel D Shipping LLC
SDNY Case No. 21-cv-5071 (VEC)
Our Ref: 35180

Dear Judge Caproni:

We represent Defendant Laurel Shipping LLC (f/k/a Laurel D Shipping LLC) in the above-referenced action.

Pursuant to Rule 6 and Your Honor's June 11, 2021 Order (Dkt. #12), we write with the consent of Plaintiff's counsel to request: (i) an extension of time for Laurel Shipping to answer/respond to the Amended Verified Complaint; and (ii) an adjournment of the initial pretrial conference currently scheduled for July 30, 2021 at 11:30 a.m. These are the first such requests made by either party.

This action concerns a dispute under a voyage charter party for the carriage of cargo aboard the crude oil tanker CE-NIRIIS. Upon Plaintiff's *ex parte* application, Your Honor directed the Clerk of the Court to issue process of maritime attachment and garnishment against Laurel Shipping's property pursuant to Rule B of the Supplemental Rules for Admiralty or Maritime Claims by Order dated June 10, 2021 (Dkt. #11).

On July 1, 2021, we wrote to Plaintiff's counsel to advise that we had just been retained to defend Laurel Shipping in this action and to request a 30-day extension of time

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to file a responsive pleading (the current deadline for which is **July 12, 2021**). The parties then conferred on the present extension and adjournment requests. So that Plaintiff need not address any filings made by Laurel Shipping during the August holiday period in Greece (where the Vessel's commercial manager is located), the parties propose: (i) extending Laurel Shipping's time to answer/respond to the Amended Verified Complaint to **September 1, 2021**; and (ii) adjourning the initial pretrial conference, subject to Your Honor's availability, to either **September 3, 10, or 17**. We also note that the proposed extension would approximate the time provided to a defendant upon waiving service under Rule 4(d)(3).

We thank the Court for its attention to the foregoing requests and stand ready to answer any questions the Court may have regarding this matter.

Respectfully submitted,
HILL RIVKINS LLP



Justin M. Heilig
Casey M. O'Brien

Cc: All counsel of record via ECF

Application GRANTED in part and DENIED in part. Defendant's deadline to answer, move, or otherwise respond to the Amended Verified Complaint is adjourned to **Wednesday, September 1, 2021**. But the Court sees no reason to adjourn the initial pretrial conference; Defendant should have enough time to prepare for the conference before the commencement of the Greek holiday season. The initial pretrial conference will take place as scheduled on **Friday, July 30, 2021 at 11:30 A.M.** and the joint pre-conference submissions are due no later than **Thursday, July 22, 2021**. For the conference dial in information and a description of the joint pre-conference submissions, the parties should consult the Court's order at docket entry 12.

SO ORDERED.



Date: July 7, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE